

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	DECLARATION OF CHRISTOPHER M.
CORRECTIONS CORPORATION OF)	WOOD IN SUPPORT OF LEAD
AMERICA, et al.,)	PLAINTIFF'S MOTION TO COMPEL
Defendants.)	PRODUCTION OF IMPROPERLY
_____)	WITHHELD DOCUMENTS

[FILED UNDER SEAL]

I, CHRISTOPHER M. WOOD, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Tennessee and this Court. I am a member of the law firm Robbins Geller Rudman & Dowd LLP, Lead Counsel for Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund and the Class in the above-captioned action. This declaration is made in support of Lead Plaintiff's Motion to Compel Production of Improperly Withheld Documents. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit 1: Email from Michael Pugh to Michael Nalley, Subject: RE: FYI only FW: Northeast Ohio Correctional Center, dated August 21, 2013 (Bates No. CORECIVIC_1246797-CORECIVIC_1246799) **[FILED UNDER SEAL - SUBMITTED FOR IN CAMERA PRIVILEGE REVIEW PURSUANT TO THE COURT'S FEBRUARY 13, 2020 ORDER];**
- Exhibit 2: Email from Keith Hall to John Robinson, Subject: FW: OIG audit, dated April 17, 2014 (Bates No. CORECIVIC_1265122-CORECIVIC_1265123) **[FILED UNDER SEAL - SUBMITTED FOR IN CAMERA PRIVILEGE REVIEW PURSUANT TO THE COURT'S FEBRUARY 13, 2020 ORDER];**
- Exhibit 3: Email from Natasha Metcalf to Samantha Lee, Subject: Response to OIG Draft Adams Report_KL 11.22.16.docx, dated November 22, 2016 (Bates No. CORECIVIC_1057702-CORECIVIC_1057723) **[FILED UNDER SEAL - SUBMITTED FOR IN CAMERA PRIVILEGE REVIEW PURSUANT TO THE COURT'S FEBRUARY 13, 2020 ORDER];**
- Exhibit 4: Email from Tony Grande to Jeb Beasley and Bart VerHulst, Subject: Fwd: New OIG Audit: Review of the Federal Bureau of Prisons' Private Prison Contract Monitoring, dated April 11, 2014 (Bates No. CORECIVIC_0959395-CORECIVIC_0959399) **[FILED UNDER SEAL - SUBMITTED FOR IN CAMERA PRIVILEGE REVIEW PURSUANT TO THE COURT'S FEBRUARY 13, 2020 ORDER];**
- Exhibit 5: Email from Ashley Odubeko to Damon Hininger, David Garfinkle *et al.*, Subject: Approval Request -Eden Detention Center, dated March 27, 2015 (Bates No. CORECIVIC_1197546-CORECIVIC_1197554) **[FILED UNDER SEAL - SUBMITTED FOR IN CAMERA PRIVILEGE REVIEW PURSUANT TO THE COURT'S FEBRUARY 13, 2020 ORDER];**

- Exhibit 6: Letter from Willow E. Radcliffe, counsel for Plaintiff, to Brian T. Glennon, *et al.*, counsel for Defendants, dated August 7, 2018 **[FILED UNDER SEAL]**;
- Exhibit 7: Letter from Faraz R. Mohamaddi, counsel for Defendants, to Willow E. Radcliffe, counsel for Plaintiff, dated August 10, 2018 **[FILED UNDER SEAL]**;
- Exhibit 8: Letter from Willow E. Radcliffe, counsel for Plaintiff, to Brian T. Glennon, *et al.*, counsel for Defendants, dated August 22, 2018 **[FILED UNDER SEAL]**;
- Exhibit 9: Letter from Faraz R. Mohamaddi, counsel for Defendants, to Willow E. Radcliffe, counsel for Plaintiff, dated August 31, 2018 **[FILED UNDER SEAL]**;
- Exhibit 10: Letter from Willow E. Radcliffe, counsel for Plaintiff, to Brian T. Glennon, *et al.*, counsel for Defendants, dated September 7, 2018 **[FILED UNDER SEAL]**;
- Exhibit 11: Excerpts from Privilege Log produced by Defendants on October 9, 2018 **[FILED UNDER SEAL]**;
- Exhibit 12: Excerpts from Privilege Log produced by Defendants on October 15, 2018 **[FILED UNDER SEAL]**;
- Exhibit 13: Letter from Christopher M. Wood, counsel for Plaintiff, to Brian T. Glennon, *et al.*, counsel for Defendants, dated November 21, 2018 **[FILED UNDER SEAL]**;
- Exhibit 14: Letter from Kenneth J. Black, counsel for Plaintiff, to Brian T. Glennon, *et al.*, counsel for Defendants, dated November 29, 2018 **[FILED UNDER SEAL]**;
- Exhibit 15: Letter from Bret M. Geckeler, counsel for Defendants, to Christopher Lyons, counsel for Plaintiff, dated December 3, 2018 **[FILED UNDER SEAL]**;
- Exhibit 16: Letter from Bret M. Geckeler, counsel for Defendants, to Christopher Lyons, counsel for Plaintiff, dated December 4, 2018 **[FILED UNDER SEAL]**;
- Exhibit 17: Letter from Kenneth J. Black, counsel for Plaintiff, to Brian T. Glennon, *et al.*, counsel for Defendants, dated December 7, 2018 **[FILED UNDER SEAL]**;
- Exhibit 18: Excerpts from Privilege Log produced by Defendants on December 22, 2018 **[FILED UNDER SEAL]**;
- Exhibit 19: Letter from Kenneth J. Black, counsel for Plaintiff, to Eric C. Pettis, *et al.*, counsel for Defendants, dated December 20, 2019 **[FILED UNDER SEAL]**;
- Exhibit 20: Letter from Eric C. Pettis, counsel for Defendants, to Kenneth J. Black, counsel for Plaintiff, dated January 23, 2020 **[FILED UNDER SEAL]**;

- Exhibit 21: Excerpts from Privilege Log produced by Defendants on January 23, 2020 **[FILED UNDER SEAL]**;
- Exhibit 22: Letter from Eric C. Pettis, counsel for Defendants, to Kenneth J. Black, counsel for Plaintiff, dated February 5, 2020 **[FILED UNDER SEAL]**;
- Exhibit 23: Excerpts from Privilege Log produced by Defendants on February 6, 2020 **[FILED UNDER SEAL]**;
- Exhibit 24: Letter from Eric C. Pettis, counsel for Defendants, to Christopher Lyons, counsel for Plaintiff, dated February 14, 2020 **[FILED UNDER SEAL]**;
- Exhibit 25: Excerpts from Privilege Log produced by Defendants on February 24, 2020 **[FILED UNDER SEAL]**;
- Exhibit 26: Letter from Faraz R. Mohamaddi, counsel for Defendants, to Kenneth J. Black, counsel for Plaintiff, dated December 12, 2018 **[FILED UNDER SEAL]**.

DATED: February 27, 2020

ROBBINS GELLER RUDMAN & DOWD LLP
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s/ Christopher M. Wood
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 27, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood

CHRISTOPHER M. WOOD

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Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)